



Re: Winter Warm-Stacking of Rig

Hanh Shaw to: brian

10/20/2011 10:17 AM

Cc: Cindi Godsey, Cool.Richard, Dianne Soderlund, Lidgard.michael, Courtney Weber, fordham.tami, mayers.timothy

Hello Brian,

The Cook Inlet NPDES General Permit (AKG315000) is not available to Escopeta for discharges while the rig is in shut-down mode over the winter. The permit is specific for oil and gas facilities that are engaged in the drilling of wells during exploration or development and production.

EPA has researched other NPDES permitting mechanisms that Escopeta may pursue for authorizations to discharge. The 2008 Vessel General Permit, administered by our headquarters office, can be utilized for discharges of the waste streams you noted. Please visit the web site below for information regarding the Vessel GP and how to request permit authorization.

Cindi Godsey is EPA Region 10's contact for the Vessel GP. Please feel free to contact her at (907) 271-6561 or godsey.cindi@epa.gov if you have any questions.

Thanks,
Hanh

<http://cfpub.epa.gov/npdes/vessels/vgpermit.cfm>

Brian

Greetings Ms. Shaw,

10/12/2011 03:32:12 PM

From: Brian <brian@webbpetro.com>
To: Hanh Shaw/R10/USEPA/US@EPA
Cc: Bob Laule Ex. 6, Bruce <bruce@webbpetro.com>, Donnie Durham <ddurham@spartanoffshore.com>, JW Harrington <spartan151@spartanoffshore.com>, Jerry Cloud Ex. 6, Keith Spalding <keith.spalding@msrllp.com>, Terry Parker <tparker@spartanoffshore.com>, Ex. 6 Ed Oliver Ex. 6
Date: 10/12/2011 03:32 PM
Subject: Winter Warm-Stacking of Rig

Greetings Ms. Shaw,

As our drilling season closes as more leaves fall, we are beginning the process of examining safe harborage of Spartan 151 over the winter months in potential ice-free harbors.

We are actively working with the Port Graham Native Community to assess whether the old cannery dock as well as the old log-loading dock there, may be suitable for use. The elders and community have been supportive of this potential economic opportunity presented to them. The rig would be towed to location, with the legs then set down on the harbor floor, and be approximately 30 feet from the dock, connected via a gangway.

While we would not be engaged in any way in any drilling processes, we will have basic maintenance crews onboard throughout the winter, and could experience the need for discharges from streams:

1. 002 Deck Drainage
2. 003 Sanitray Waste
3. 004 Domestic Waste
4. 008 Fire Control System Test Water

Total number of personnel is expected to be between 12-18 and is variable depending on maintenance activities.

We are exploring options of utilizing onshore facilities for living as well as cooking at the shut-down cannery, and if so, could decrease dramatically any of the above outfalls. It is unknown regarding whether the cannery dock can support a sewage connection for the rig. There is however, shore power as well as potable water connections that are available.

While reviewing the map of Cook Inlet within the NPDES General Permit (AKG-31-5000, page 9), I see the general permit extending to this location. However the Port Graham-Nanwalek area is covered under an Area Meriting Special Attention (AMSA) provision by the Alaska Department of Fish & Game on page 8 of the general permit.

Escopeta is attempting to assess whether our permit will allow for the four (4) discharges mentioned above, especially considering the small number of personnel, and the fact we will not be actively drilling.

Any assistance in answering the issues for the discharges in this location, will be greatly appreciated.

Brian

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